

EXHIBIT D
TO DECLARATION OF ELLIOT B. GIPSON

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Attorneys for Defendant
ACER Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CYBERsitter, LLC a California limited
liability company, d/b/a Solid Oak
Software,

Plaintiff,

v.

The People's Republic of China, a
foreign state; Zhengzhou Jinhui
Computer System Engineering Ltd., a
Chinese corporation; Beijing Dazheng
Human Language Technology
Academy Ltd., a Chinese corporation;
Sony Corporation, a Japanese
corporation; Lenovo Group Limited, a
Chinese corporation; Toshiba
Corporation, a Japanese corporation;
ACER Incorporated, a Taiwanese
corporation; ASUSTeK Computer Inc.,
a Taiwanese corporation; BenQ
Corporation, a Taiwanese corporation;
Haier Group Corporation, a Chinese
corporation; DOES 1-10,

Defendants.

Case No. CV 10-0038 GAF (SHx)

**SECOND STIPULATION TO
EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT**

Complaint Served: April 28, 2010

Current Response Date: June 17, 2010

New Response Date: July 1, 2010

**[PROPOSED] ORDER FILED
CONCURRENTLY HEREWITH**

1 WHEREAS, plaintiff CYBERSitter, LLC (“CYBERSitter”) filed a Complaint
 2 for Misappropriation of Trade Secrets; Unfair Competition; Copyright
 3 Infringement; and Civil Conspiracy (“Complaint”) on January 5, 2010 against
 4 Defendants The People’s Republic of China; Zhengzhou Jinhui Computer System
 5 Engineering Ltd.; Beijing Dazheng Human Language Technology Academy Ltd.;
 6 Sony Corporation; Lenovo Group Limited; Toshiba Corporation; ACER
 7 Incorporated (“ACER”); ASUSTeK Computer Inc.; BenQ Corporation; Haier
 8 Group Corporation; and DOES 1-10;

9 WHEREAS, on May 17, 2010, Defendant Defendants ACER Incorporated;
 10 ASUSTeK Computer Inc.; BenQ Corporation (collectively “the Taiwanese
 11 Defendants”) and CYBERSitter filed a *FIRST STIPULATION Extending Time to*
 12 *Answer the Complaint* (Dkt. 10) (“the First Stipulation”) to extend the date for the
 13 Taiwanese Defendants to respond to the Complaint to June 17, 2010;

14 WHEREAS, the Taiwanese Defendants are the only Defendants that have
 15 been served to date;

16 WHEREAS, pursuant to the First Stipulation, the Taiwanese Defendants are
 17 required to respond to the Complaint on or before June 17, 2010;

18 WHEREAS, CYBERSitter and the Taiwanese Defendants have agreed to
 19 extend the date by which the Taiwanese Defendants must respond to the Complaint
 20 an additional fourteen (14) days;

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1 THE PARTIES HEREBY STIPULATE AND AGREE, by and through their
2 attorneys of record, that the Taiwanese Defendants shall have up to and including
3 July 1, 2010 to file and serve their responses to the Complaint. This agreement has
4 no effect on any provision in the First Stipulation, aside from extending the
5 Taiwanese Defendants' current response due date from June 17, 2010 to July 1,
6 2010.

7 IT IS SO STIPULATED.

8
9 Dated: June 11, 2010

Gipson Hoffman & Pancione



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22 d/b/a Solid Oak Software
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1 Dated: June 11, 2010

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3 /s/ Robert W. Dickerson
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15 Attorneys for Defendant
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17 Dated: June 11, 2010

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